

Message

From: Magnan, Eric [Magnan.Eric@epa.gov]
Sent: 6/19/2015 6:37:59 PM
To: Buffleben, Matthew@Waterboards [Matthew.Buffleben@waterboards.ca.gov]
CC: Greenberg, Ken [Greenberg.Ken@epa.gov]; Bennett, Jarma@Waterboards [Jarma.Bennett@waterboards.ca.gov]
Subject: RE: California SRF Comments
Attachments: Metric 7d1.xlsx; Metric 10a1.xlsx

Hi Matthew,

Non-receipt of DMRs means that the Detailed Facility Report (populated with data from ICIS) showed a DMR was not received and this information was not noted in the facility file (the file at the regional board). The compliance data in ICIS did not match the information in the file.

Here are the details for the other findings we discussed over the phone.

Finding 3-1

Here are some more details on the SEVs:

Fallbrook PUD WWTP (CA0108031)

I see 3 SEVs noted as being listed in CIWQS and not in ICIS. The date of the violations and the violation descriptions taken from CIWQS are here:

3/9/2011 – CAT1 – “Sulfate, Total (as S) Daily Max limit is 150 mg/L and reported value was 190.”

1/31/2011 – DMON – “The January 2011 monthly report failed to include the status of the Buena Vista.”

12/31/2010 – DMON – “The January – December 2010 annual report failed to include annual test results.”

Seaworld (CA0107336)

The facility file review notes that ICIS lists effluent limit violations for TSS that do not appear on the CIWQS facility at a glance report.

I see 2 SEVs noted as being listed in CIWQS and not in ICIS. The date of the violations and the violation descriptions taken from CIWQS are here:

10/31/2010 – OEV – “Total Coliform 30-Day Average limit is 10% and reported value was 29%.”

12/12/2011 – DMON – “SeaWorld personnel did witness a bypass at the east treatment plant in 2011.”

South Bay Power Plant (CA0001368)

The facility file review notes that a monitoring deficiency was noted in the last inspection that was not listed in ICIS.

San Luis Rey WRF (CA0107433)

The facility file review notes SEVs as Performance Audit Inspection deficiencies and an SSO.

Mission Basin Desalting Facility (CA0107433)

No additional information in the file.

Finding 3-3

I attached an excel spreadsheet (Metric 7d1.xlsx) that details the major facility universe, the major facilities in compliance, and the major facilities not in compliance that were used for calculating Metric 7d1.

Finding 4-2

I attached an excel spreadsheet (Metric 10a1.xlsx) that details the universe of facilities in SNC for 2 quarters or more. It shows the facilities that did and did not have timely and appropriate enforcement action.

I will send along information for SF Regional Board shortly. Let me know if you have any questions.

Thanks,

Eric

From: Buffleben, Matthew@Waterboards [mailto:Matthew.Buffleben@waterboards.ca.gov]
Sent: Tuesday, June 16, 2015 11:27 AM
To: Magnan, Eric
Cc: Greenberg, Ken; Bennett, Jarma@Waterboards
Subject: RE: California SRF Comments

Hi Eric,

Can you clarify for us, when you reference non-receipt of DMRs for finding 1-2, you are actually referring to the DMRs themselves and not referring to whether the Regional Board has reviewed them (or the SMRs)?

Matthew

From: Magnan, Eric [mailto:Magnan.Eric@epa.gov]
Sent: Wednesday, June 10, 2015 6:53 PM
To: Buffleben, Matthew@Waterboards
Cc: Greenberg, Ken
Subject: California SRF Comments

Hi Matthew,

I heard some of your comments on the draft report through Ken. I saw that Julie sent you the correct report earlier today.

Here's a little more information to answer your comments I heard that are still relevant in the correct report:

1. Finding 1-2: Details of unreported violations and enforcement actions in RB9 under metric 2b.
 - a. SONGS Unit 2 (CA0108073)
 - i. Non-receipt of DMRs not listed in the file.
 - ii. Staff enforcement letters not on Detailed Facility Report (DFR). Something not present on the DFR indicates it was not entered into ICIS.
 - b. SONGS Unit 3 (CA0108181)
 - i. Non-receipt of DMRs not listed in the file.
 - ii. Staff enforcement letters are not on DFR.
 - c. Lathan WWTP (CA0107417)
 - i. Enforcement actions were not listed on DFR. The following were found in the file, but did not show on the DFR: Settlement Offer (January 2012), NOV (August 15, 2011), ACL, and penalty amount.
 - d. SCWD Groundwater Recovery (CA0107417)
 - i. There are several different facilities under this permit number that ultimately discharge through the San Juan Creek Ocean Outfall. This was not reflected in DFR.
 - e. South Bay Water Reclamation Plant (CA0109045)
 - i. Non-receipt of DMRs not listed in the file.
2. Finding 3-1: The 5 SEVs noted in files reviewed for RB9 that were not recorded in ICIS are the following (none were SNC):

- a. Fallbrook PUD WWTP (CA0108031)
- b. Seaworld (CA0107336)
- c. South Bay Power Plant (CA0001368)
- d. San Luis Rey WRF (CA0107433)
- e. Mission Basin Desalting Facility (CA0107433)

Let me know if I missed anything or if you have additional comments and questions.

Thanks,

Eric

Eric Magnan, P.E.
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